

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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**RIGOBERTO ANDUX MIRABAL, GABRIEL  
CANO ARANGO, YOAN AQUINO  
MARTINEZ, LUCAS PEDRONZO TOLEDO,  
JULIO CESAR OCHOA, NELSON BATISTA  
CORBO, WILLIAM RICARDO ANTUNEZ  
VALDEZ, and THE ESTATE OF CARLOS  
ALBERTO on behalf of themselves and all others  
similarly situated who were employed by  
Caribbean Car Wash, Inc.**

X

Civil Action

Case No.: 19-cv-16608

Plaintiffs,  
- against -

**CARIBBEAN CAR WASH, INC., ULIPIANO  
RODRIGUEZ, ROBERTO RODRIGUEZ, and  
OMAR RODRIGUEZ,**

Defendants,

X

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
CLASS AND COLLECTIVE SETTLEMENT AND RELATED RELIEF**

**PLEASE TAKE NOTICE**, that Plaintiffs Jean Rigoberto Andux Mirabal, Gabriel Cano Arango, Yoan Aquino Martinez, Lucas Alberto Pedronzo Toledo, Julio Cesar Ochoa, Nelson Batista Corbo, William Ricardo Antunez Valdez, and the Estate of Carlos Alberto on behalf of themselves and a putative collective of similarly situated individuals, will move before the Honorable Edward S. Kiel, U.S.M.J. on January 13, 2022 or as soon thereafter as counsel may be heard for an Order (i) granting final approval of the class and collective action settlement; (ii) granting Class Counsel its requested attorneys' fees of \$333,333.33 representing one third of the Settlement Fund; (iii) reimbursing Class Counsel for its litigation costs in the amount of \$6,823.69; (iv) granting SSI its fees and costs incurred in administering the settlement to be paid

from the Settlement Fund; and (v) granting all other relief the Court deems appropriate. Plaintiffs submit with this motion a supporting Memorandum of Law, a declaration from Avi Mermelstein with exhibits thereto, and a declaration from Robert Hyte of Settlement Services, Inc. with an exhibit thereto.

Dated: New York, New York  
December 24, 2021

Respectfully submitted,  
ARENSON, DITTMAR & KARBAN

/s/

By: Avi Mermelstein  
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**CERTIFICATION OF SERVICE**

I, Avi Mermelstein, certify that a copy of Plaintiffs' motion for final approval of class and collective settlement was served electronically by the generation and transmission of Notice of Electronic Filing on December 24, 2021 upon:

Victor A. Deutch, Esq. (ECF Filing User)  
1000 U.S. Highway 9 North, Ste 204  
Woodbridge, NJ 07095  
vdeutch@deutchassociates.com

Dated: New York, New York  
December 24, 2021

ARENSON, DITTMAR & KARBAN

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/s/  
By: Avi Mermelstein  
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